



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH/LZ/AB
F. #2022R01030

271 Cadman Plaza East
Brooklyn, New York 11201

August 16, 2023

BY ECF

The Honorable Joanna Seybert
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

The Honorable Orelia E. Merchant
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. George Anthony Devolder Santos
Criminal Docket No. 23-197

United States v. Samuel Miele
Criminal Docket No. 23-327

Dear Judge Seybert and Judge Merchant:

Pursuant to Local Rule 50.3.2 and 50.4 of the Guidelines for the Division of Business Among District Judges, the government hereby provides notice that the above-referenced cases may be presumptively related.

Local Rule 50.3.2(b)(1) provides for a “presumption that one case is ‘related’ to another when the facts of each arise out of the same charged criminal scheme(s), transaction(s), or event(s), even if different defendants are involved in each case.” Local Rule 50.3.2(c)(1) directs the United States Attorney’s Office to “give notice to all relevant judges whenever it appears that one case may be presumptively related to another pursuant to Section (b)(1).”

This letter constitutes the notice directed by Local Rule 50.3.2(c)(1). These cases may be presumptively related because the facts of each case arise out of overlapping events. Specifically, a grand jury in United States v. Devolder Santos returned an indictment charging defendant Devolder Santos with, among other things, five counts of wire fraud and three counts of money laundering related to Devolder Santos’s efforts to defraud prospective contributors to a

purported independent expenditure committee that would support his campaign for the U.S. House of Representatives during the 2022 election cycle. Similarly, a grand jury in United States v. Miele has returned an indictment charging Miele with four counts of wire fraud and one count of aggravated identity theft related to Miele's efforts to defraud prospective contributors to Devolder Santos's campaign for the U.S. House of Representatives during the 2022 election cycle.¹ As the cases may be presumptively related, the government respectfully provides notice that reassignment may be appropriate, as it may result in a significant savings of judicial resources and serve the interests of justice.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
Ryan C. Harris
Anthony Bagnuola
Laura Zuckerwise
Assistant United States Attorney
(718) 254-7000

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S. Department of Justice

By: /s/
Jacob R. Steiner
John Taddei
Trial Attorneys, Public Integrity Section
U.S. Department of Justice

cc: Kevin Marino, Esq. (via ECF)
Joseph Murray, Esq. (via ECF)

¹ To be clear, while the two cases arise out of overlapping events, the criminal schemes charged in the two cases are distinct.